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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

MARTHA VALENTINE, et. al.

Plaintiffs,

v.

CROCS, INC.,

Defendant.

Case No. 3:22-cv-07463-TLT-PHK

**JOINT STATUS REPORT PURSUANT TO
DKT. NO. 53**

Hon. Peter H. Kang

CASE NO. 3:22-CV-07463-TLT

JOINT STATUS REPORT PURSUANT TO DKT. NO. 53

1 Counsel for Plaintiffs Martha Valentine, Ruby Cornejo, and Tiffany Avino (“Plaintiffs”)
2 and counsel for Defendant Crocs, Inc. (“Crocs”) (collectively, the “Parties”) submit this Joint
3 Status Report pursuant to Dkt. No. 53 regarding scheduling the 30(b)(6) depositions.

4 The Parties had a Case Management Conference with Judge Thompson on Thursday,
5 December 14, 2023, during which the Parties discussed their renewed request for a 90-day
6 extension of all deadlines. *See* Dkt. 55 (Joint Case Management Statement, describing the need for
7 extension). Judge Thompson indicated at the hearing that she would likely grant that request.

8 On December 15, 2023, Judge Thompson issued a minute order granting the discovery
9 deadline extension. That order read as follows:

10 **ORDER GRANTING DISCOVERY DEADLINE EXTENSION.**
11 **The parties requested a 90-day extension to the discovery**
12 **deadlines. The Court GRANTS the extension. The deadline**
13 **for fact discovery has been extended from August 6, 2024 to**
14 **November 5, 2024. Likewise, the extension for expert**
15 **discovery is extended from September 30, 2024 to December**
16 **30, 2024.**

17 Because the Order did not specifically mention the extension of the timeframe for class
18 discovery (currently set to have a January 24 cut-off), the Parties wrote to the Court asking for
19 clarification that the 90-day extension applies to all discovery. As of the time of this filing, the
20 Parties have not received a reply.

21 The parties have agreed that if class discovery is extended, Rule 30(b)(6) depositions will
22 take place in February 2024, on specific dates to be agreed to by the Parties at least by January 8,
23 2024.

24 The parties have agreed that if class discovery is not extended, the 30(b)(6) depositions will
25 take place on January 11 and January 16-19, 2024. Crocs has already provided its grouping of
26 topics for the five planned 30(b)(6) witnesses, and will identify which witness will be offered on
27 which day no later than December 22, 2024, if class discovery is not extended.

28 DATED: December 18, 2023

/s/ Kali R. Backer
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ATTESTATION

Pursuant to Local Rule 5-1(h)(3), I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing of this stipulation and have authorized the filing of this stipulation.

DATED: December 18, 2023

Respectfully submitted,

/s/ Becca Wahlquist
Becca Wahlquist (SBN 215948)